

IN THE UNITED STATES DISTRICT CIRCUIT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

STEVEN KNURR, *et al.*,)
Plaintiffs,) Civil Action No.: 1:16-cv-01031-TSE-MSN
v.) CLASS ACTION
ORBITAL ATK, INC., *et al.*,)
Defendants.)

**DECLARATION OF GEORGE E. ANHANG IN SUPPORT OF THE MOTION TO SET
ASIDE PART OF THE MAGISTRATE JUDGE'S JUNE 25, 2018 ORDER PURSUANT
TO FED. R. CIV. P. 72 OF DEFENDANTS ORBITAL ATK, INC., DAVID W.
THOMPSON, GARRETT E. PIERCE, BLAKE E. LARSON AND HOLLIS THOMPSON**

Pursuant to 28 U.S.C. § 1746, George E. Anhang declares as follows:

1. My name is George E. Anhang and I am Counsel with the law firm of Shearman & Sterling LLP. I work in the firm's Washington, DC office. I am a member in good standing of the bars of New York and the District of Columbia, and I am admitted *pro hac vice* in this action.
2. I submit this Declaration in connection with the Motion to Set Aside Part of the Magistrate Judge's June 25, 2018 Order of Defendants Orbital ATK, Inc., n/k/a Northrop Grumman Innovation Systems, Inc. ("Orbital ATK" or "Company"), David W. Thompson, Garrett E. Pierce, Blake E. Larson, and Hollis Thompson.
3. Attached as Exhibit A is a true and accurate copy of a sworn Declaration of Doug Fellman, previously submitted to the Magistrate Judge, *see* ECF 157.

4. Attached as Exhibit B is a true and accurate copy of a transcript of the motion hearing held in this action before the Magistrate Judge on May 4, 2018.
5. Attached as Exhibit C is a true and accurate copy of an email exchange between Plaintiffs' counsel and me concerning Defendants' production of certain unredacted witness interview memoranda in this action.
6. Attached as Exhibit D is a true and accurate copy of a transcript of the motion hearing held in this action before the Magistrate Judge on June 22, 2018.
7. Attached as Exhibit E is a true and accurate copy of a transcript of the first part of a motion hearing held in this action before the Magistrate Judge on June 25, 2018.
8. Attached as Exhibit F is a true and accurate copy of a transcript of the second part of a motion hearing (sealed by the Magistrate Judge) held in this action before the Magistrate Judge on June 25, 2018.
9. Attached as Exhibit G is a true and accurate copy of Lead Plaintiffs' Motion to Compel Royal Ahold N.V. and U.S. Foodservice, Inc. to Comply with the Court's March 12, 2004 Order and to Produce Witness Statements, Memoranda, Interview Notes and Related Materials, filed in *In re Royal Ahold N.V. Securities & ERISA Litigation*, 230 F.R.D. 433 (2005).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 9, 2018
Washington, DC

By: /s/ George E. Anhang
George E. Anhang